

April 28, 2016

*Via ECFS*

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 10-90 Arcadia Telephone Cooperative  
Challenge to Competitive Coverage of Sunbeam Acquisition Corp. d/b/a PrairieNet  
and Western Iowa Networks**

Dear Ms. Dortch:

On behalf of Arcadia Telephone Cooperative, Olsen Thielen files the attached challenge to the competitive coverage data set forth in the Alternative Connect America Cost Model (A-CAM) version 2.2 released by the Wireline Competition Bureau on April 7, 2016.

Kindly direct any questions regarding this filing to my attention.

Sincerely,

Pamela L. Hintz



Senior Telecommunications Consultant at  
Olsen Thielen

cc: Sunbeam Acquisition Corp.  
Western Iowa Networks

Alternative Connect America Cost Model Challenge (A-CAM) Process  
OMB Control Number 3060-1188  
FCC Form 505

Filing Entity:	Arcadia Telephone Cooperative
FRN (if applicable):	0003-7573-74
Name of Person Filling Out Form:	Pamela L. Hintz
Email Address of Person Filling out Form:	<a href="mailto:phintz@otcpas.com">phintz@otcpas.com</a>
Mailing Address of Person Filling out Form:	2675 Long Lake Road, St.Paul, MN 55113-1117
Phone Number of Person Filling out Form:	(651) 621-8535
Name of Person Certifying Data within Form:	Tony Vonnahme
Mailing Address of Person Certifying Data within Form:	200 Center Street, Arcadia, IA 51430
Email Address of Person Certifying Data within Form:	<a href="mailto:tonyvonnahme@netins.net">tonyvonnahme@netins.net</a>
Phone Number of Person Certifying Data within Form:	(712) 830-3084



[illegible]

190279602001107	1A	Breda Telephone Corp. d/b/a Western Iowa Networks					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
190279602001113	1A	Breda Telephone Corp. d/b/a Western Iowa Networks					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
190279602001114	1A	Breda Telephone Corp. d/b/a Western Iowa Networks					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
190279602001120	1A	Breda Telephone Corp. d/b/a Western Iowa Networks					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
190279602002001	1A	Breda Telephone Corp. d/b/a Western Iowa Networks					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
190279602002006	1A	Breda Telephone Corp. d/b/a Western Iowa Networks					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
190279602002008	1A	Breda Telephone Corp. d/b/a Western Iowa Networks					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
190279602002009	1A	Breda Telephone Corp. d/b/a Western Iowa Networks					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
190279602002035	1A	Breda Telephone Corp. d/b/a Western Iowa Networks					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
190279602002067	1A	Breda Telephone Corp. d/b/a Western Iowa Networks					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B

Accuracy and Due Diligence Certification	
All Filers Must Fill Out	
By Initialing below, I certify that all statements contained in the attached form are true and accurate to the best of my knowledge, and that I have undertaken due diligence to obtain knowledge regarding these claims.	
Certifier's Initials:	T.U.
Date:	4-28-2016

Notice of Challenge Certification	
(Served to Unserved and Unserved to Served Challengers Fill Out One of the Following Blocks - Respondents Do Not Fill Out)	
Service of Notice Successful	
By Initialing below, I certify that notice of this challenge has been served on all interested parties.	
Certifier's Initials:	T.U.
Date:	4-28-2016
Service of Notice Unsuccessful	
By initialing below I certify that, following a good faith effort, I was unable to serve notice of this challenge on all interested parties due to lack of information regarding the address of such parties.	
Name of Party/Parties that Could Not Be Served:	
Certifier's Initials:	
Date:	

The certifications on this page are subject to the penalties for false statements under 18 U.S.C. 1001.

## Form 505 – Exhibit A

### *WC Docket 10-89, Alternative Connect America Cost Model (A-CAM) Challenge*

Skybeam Acquisition Corp in Iowa:

Per the National Broadband Map, Skybeam Acquisition Corp., operating under the trade name Prairieinet<sup>1</sup>, (“Skybeam”) claims to offer voice service in 47 Census Blocks in Arcadia's Serving Area. Arcadia hereby challenges such claims with respect to all 47 Census Blocks. As evidenced in Attachment A, according to the website of Rise Broadband<sup>2</sup>, Skybeam’s parent company, the Rise Broadband family of companies’ local phone service “includes 911 services and free porting, so you can keep your existing phone number.”<sup>3</sup> As such, it would be expected that Skybeam would have the capability to port local numbers within the Arcadia rate center. However, to date, as a rural ILEC, Arcadia has yet to receive a single port order for any of its local exchange customers from Skybeam or any other competitive provider.

In addition, pursuant to data found in the Local Exchange Routing Guide, Arcadia is the only provider within Arcadia’s study area that has been assigned NANPA numbering resources. Arcadia's records also indicate that no competitive provider has requested local interconnection from Arcadia or ordered facilities required to provide local exchange. Rather, information contained on the Iowa Utilities Board Website (<https://efs.iowa.gov>) indicates that Arcadia has only entered into a handful of agreements with wireless providers which govern only the reciprocal transport and termination of traffic exchanged between Arcadia and such providers.

Based on the evidence provided herein, Arcadia challenges the competitive presence of Skybeam Acquisition Corp. in the Census Blocks listed on its Form 505.

<sup>1</sup> See Statement of Paul Lambert filed by JAB Wireless with the FCC in WC 14-93 on November 10, 2014

<sup>2</sup> As of May 15, 2016, Rise Broadband will be the new name for Jab Broadband pursuant to information appearing on its Website

<sup>3</sup> Retrieved from Rise <http://risebroadband.com/residential/>



## High Speed Internet

Voice

PC Support



844-411-RISE (tel:844-411-

RISE)

(http://risebroadband.com/)

Account (http://risebroadband.com/my-account/)

Pay My Bill

(https://jabwi.convergentcare.com/jabwi/goToLogin.action?subClientId=3902#Application/onReady)

## Residential High-Speed Internet

Rise Broadband provides high-speed Internet and digital phone service in 16 states in the Midwest, Rocky Mountain and Southwest regions.

Whether you live in a suburban or rural area, Rise helps keep you and your family connected with the people and things you value most.

Feel Free to enjoy lightning-fast downloads and quick access to information, entertainment, education and streaming video. Take advantage of our PC Care and Device Connection/Managed Router services to free up your time and help ensure your Internet connection is running at peak performance.

## Check availability now!

Enter your service address in the form on the right.

Or to sign up for service, call 1-844-411-RISE (844-411-7473).

Click here to learn more about [Digital Phone](#).

Click here to learn more about [PC Care](#).

Digital Phone (ActivePhone™)



ActivePhone™ gives you the power to connect AND save. It provides the features of traditional residential phone service plus all of the latest features you need to be more productive.

Add ActivePhone™ for \$9.95 a month with a 2-year wireless Internet service agreement or \$19.95 without a 2-year agreement.

Save money on your mobile phone service with ActivePhone™:



Check service availability.

☒ Home☐ Business

ADDRESS

CITY

STATE

ZIP

SEE OFFERS

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- **Unlimited Domestic Long Distance** – Call anywhere in the U.S. at no additional cost. Save your mobile plan minutes for when you really need them
- **Free International Long Distance** – Call to landlines in 64 countries and mobile phones in 13 countries at no additional cost\*
- **Free Multi-Ring** – Rings the phones in your home as well as your mobile device with a single phone number, allowing you to reduce mobile minute usage when you are home
- **ActivePhone™ Messaging** – Automatically have your voicemail messages delivered to you via email, or set the service to notify you of new voicemail messages via text message so you can choose how and when to respond to messages
- **Web-Based Administration Tools** – View your past calls, find a lost phone number, and configure your service options to meet your specific needs
- ActivePhone™ also comes with many standard phone features including **call waiting**, **caller ID with name**, **3-way calling**, **last call return** and **auto redial**
- **Active Phone™ includes 911 services** and free number porting, so you can keep your existing phone number\*



#### PC Care Service Plan

The PC Care Service Plan provides support and coverage for your PC. For only \$8.99 a month, Rise Broadband will:

- Identify and fix hardware/software errors
- Identify and assist with networking issues
- Supply standard replacement parts and in-home labor to repair one covered device as often as needed, not to exceed \$500 per year per covered device.

Support for additional PCs can be added for \$6.50 each per month.

#### Premium Technical Support Service Plan



The Premium Technical Support Service Plan provides all of the support and coverage included in the PC Care Service Plan, plus the following expanded services for only \$14.99 a month:

- Operating systems upgrade/update support\*\* (Windows PC, Mac OSX)
- Content backup/sharing support\*\*: e.g. iCloud, Google Drive, DropBox
- Computer tune-up and maintenance of PC and Mac devices
- 3rd party devices: printers, scanners, copiers, fax machines, external hard drives, etc.
- Mobile devices (including tablets): setup and trouble-shooting
- TV and video support: Internet/smart TV, Blu-Ray, DVD, game console

#### Compare PC Care to Premium Technical Support

Services Included:	PC Care	Premium Technical Support
	\$8.99	\$14.99
Configuration troubleshooting	✓	✓
Evaluating and attempting to correct software	✓	✓
Assist with operating systems and networking issues	✓	✓
Virus/spyware detection and removal	–	✓
Software and peripherals support for network, video/sound cards, memory, hard drives, CD/DVD reader/writers, printers and scanners	–	✓
Assist with home networking equipment	–	✓
Computer tune-ups and maintenance (PCs and Macs)	–	✓

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Troubleshooting and wireless support connecting TVs, Blu-Rays, tablets and mobile devices	-	✓
Content Sharing***: transfer of content from one device to another	-	✓
Online safety and security support***: Internet security, storage and backup, etc.	-	✓
Support, configuration, setup and troubleshooting of 3rd party devices: printers, scanners, copiers, fax machines, external hard drives, etc.	-	✓
Mobile Devices (including tablets): setup and trouble-shooting	-	✓
TV and Video Support: Internet/smart TV, Blu-Ray, DVD, game console	-	✓

#### A-La-Carte PC Care Options

**Don't need a monthly service plan? We can still help fix your device with several "pay-as-you-go" options below:**

**PC Maintenance** (\$50 each occurrence): Includes a Windows Disk cleanup, enabling Windows Updates and activating Windows Firewall.

**Device Setup** (\$75 each occurrence): Includes printer, camera and MP3 player setup, configuration and trouble shooting.

**PC Tune-up** (\$125 each occurrence): Includes diagnosing a PC infected with spyware, malware and viruses; helping you to select, purchase and install an Internet Security Suite or one of our licensed tools; then scanning and removal of any detected spyware/malware/viruses.

\* Rise Broadband ActivePhone™ requires a Rise Broadband Internet connection. 911 service operates based on registered address. Unlimited long distance calling is for calls made to landlines and mobile phones in the USA. Free International calling is for up to 300 minutes of calls made per line (ActivePhone™ and ActivePhone for Business™) or concurrent call session (Enterprise Cloud PBX™) to landlines in these 64 countries: Andorra, Argentina, Australia, Austria, Bahrain, Belgium, Brazil, Brunei, Bulgaria, Canada, Chile, China, Colombia, Croatia, Cyprus, Czech Republic, Denmark, Dominican Republic, Estonia, Finland, France, Georgia, Germany, Greece, Guadeloupe, Guam, Hong Kong, Hungary, Iceland, India, Indonesia, Iraq, Ireland, Israel, Italy, Japan, Latvia, Luxembourg, Macau, Malaysia, Malta, Mexico, Monaco, Netherlands, New Zealand, Norway, Panama, Peru, Poland, Portugal, Puerto Rico, Romania, Russia, Saipan, San Marino, Singapore, Slovakia, Slovenia, South Africa, South Korea, Spain, Sweden, Switzerland, and mobile phones in these 13 countries: Brunei, Canada, China, Guam, Hong Kong, India, Macau, Malaysia, Puerto Rico, Saipan, San Marino, Singapore, South Korea. Alarms, fax, satellite TV and other systems may not be compatible. Rates exclude equipment rental of \$1 to \$6 per line or extension per month, taxes, and fees. Regular number porting, where available, averages 20-30 days. Service not available in all areas.

\*\*This service includes support for customer-purchased software and file programs. The programs themselves are not included, and will need to be purchased independently.

#### Rise Broadband

Residential High-Speed Internet  
(<http://risebroadband.com/residential/>)  
Business High-Speed Internet  
(<http://risebroadband.com/business/>)  
Contact  
(<http://risebroadband.com/contact/>)  
Careers  
(<http://risebroadband.com/careers/>)

#### Information

About Rise Broadband  
(<http://risebroadband.com/about-us/>)  
Broadband Terms  
(<http://risebroadband.com/legal/broadband-internet-terms-and-conditions-of-service/>)  
Policies and Agreements  
(<http://risebroadband.com/legal/>)

#### My Account

My Account  
(<http://risebroadband.com/my-account/>)  
Pay My Bill  
(<https://jabwl.convergentcare.com/jabwl/goToLogin.action?subClientId=3902#Application/onReady>)

#### Find Us

 (<https://www.facebook.com/pages/Rise-Broadband/1575004259448064>)

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**Form 505 – Exhibit B**

***WC Docket 10-89, Alternative Connect America Cost Model (A-CAM) Challenge***

Western Iowa Networks in Iowa:

**AFFIDAVIT OF WESTERN IOWA NETWORKS**

Based on the Sworn Affidavit of Chuck Deisbeck, CEO of Western Iowa Networks, Arcadia challenges the presence of Western Iowa Network in the 16 Census Blocks identified in Arcadia's Form 505

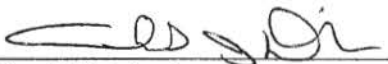
## DECLARATION OF WESTERN IOWA NETWORKS

I, Chuck Deisbeck state as follows:

1. I am General Manager of Western Iowa Networks (the "Company"). I have personal and direct knowledge of the Company's service area and its competitive overlap with neighboring incumbent local exchange carriers ("ILECs"). Based upon my personal and direct knowledge, I verify the truth and accuracy of the information contained herein.
2. The Company does not offer voice and/or broadband service within the study area of Arcadia Telephone Cooperative. The 16 census blocks identified as overlapping with Arcadia in version 2.2 of the Alternative Connect America Cost Model ("A-CAM"), in fact, are census blocks along the borders of Company's and Arcadia's respective study areas. Within these "border" census blocks, the Company and Arcadia provide service to distinct, non-overlapping portions of the census blocks.
3. Within its study area(s), the Company receives support from the federal universal service fund, including HCL, ICLS, and CAF ICC.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 27, 2016

  
\_\_\_\_\_  
Chuck Deisbeck  
CEO  
Western Iowa Networks